

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)

) Chapter 9

)

) Case No. 13-53846

)

) Hon. Steven W. Rhodes

)

**NOTICE OF 30(B)(6) DEPOSITION OF GABRIEL ROEDER SMITH &
COMPANY**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, you are hereby notified that the parties set forth in **Exhibit 1** will take the oral deposition of Gabriel Roeder Smith & Company (“Gabriel Roeder”), commencing on July 18, 2014, at 9:00 a.m. EST, and continuing thereafter until completed. Said deposition will be stenographically and videographically recorded. The deposition will be taken for the purposes of discovery, for use at court hearings or trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure. The deposition will take place at the The Westin Book Cadillac, 1114 Washington Blvd, Detroit, Michigan 48226.

Gabriel Roeder is required to designate, pursuant to Rule 30(b)(6), person(s) to testify on its behalf regarding the subject matters listed in the attached Schedule

A. Gabriel Roeder is requested to provide counsel, as soon as reasonably possible, with a written designation of the name(s) and position(s) of the persons who consent to testify on behalf of Gabriel Roeder.

Dated: July 7, 2014

/s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.
Ryan Blaine Bennett
Stephen C. Hackney
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

*Attorneys for Syncora Guarantee Inc., and Syncora
Capital Assurance Inc.*

- and -

Stephen M. Gross
David A. Agay
Joshua Gadharf
MCDONALD HOPKINS PLC
39533 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: (248) 646-5070
Facsimile: (248) 646-5075

*Local Counsel for Syncora Guarantee Inc. and
Syncora Capital Assurance Inc.*

EXHIBIT 1

Party	Counsel for Party
<i>Syncora Guarantee Inc. and Syncora Capital Assurance Inc.</i>	James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 - and - Stephen M. Gross David A. Agay Joshua Gadharf MCDONALD HOPKINS PLC 39533 Woodward Avenue Bloomfield Hills, MI 48304 Telephone: (248) 646-5070 Facsimile: (248) 646-5075

Party	Counsel for Party
<p><i>Hypothekenbank Frankfurt AG; Hypothekenbank Frankfurt International S.A.; and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A..</i></p>	<p>Howard S. Sher JACOB & WEINGARTEN, P.C. Somerset Place 2301 W. Big Beaver Road, Suite 777 Troy, Michigan 48084 Tel: (248) 649-1200 Fax: (248) 649-2920 E-mail: howard@jacobweingarten.com -and- Matthew G. Summers BALLARD SPAHR LLP 919 North Market Street, 11th Floor Wilmington, Delaware 19801 Tel: (302) 252-4428 Fax: (410) 361-8930 E-mail: summersm@ballardspahr.com -and- Vincent J. Marriott, III, Esquire BALLARD SPAHR LLP 1735 Market Street, 51st Flr. Philadelphia, PA 19103 Phone: 215.864.8236 Fax: 215.864.9762 Email: marriott@ballardspahr.com</p>
<p><i>Assured Guaranty Municipal Corp.</i></p>	<p>Lawrence A. Larose Samuel S. Kohn Robert A. Schwinger CHADBOURNE & PARKE LLP 30 Rockefeller Plaza New York, NY 10112 Telephone: (212) 408-5100 Fax: (212) 541-5369 llarose@chadbourne.com skohn@chadbourne.com rschwinger@chadbourne.com</p>

Party	Counsel for Party
<i>National Public Finance Guarantee Corp.</i>	<p>James F. Bendernagel, Jr. Guy S. Neal SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 Telephone: (202) 736-8041 Fax: (202) 736-8711 jbendernagel@sidley.com gneal@sidley.com</p> <p>-and-</p> <p>Jeffrey E. Bjork Gabriel MacConaill SIDLEY AUSTIN LLP 555 West Fifth Street, Suite 4000 Los Angeles, California 90013 Telephone: (213) 896-6000 Fax: (213) 896-6600 jbjork@sidley.com gmacconaille@sidley.com</p>

Party	Counsel for Party
<i>Financial Guaranty Insurance Company</i>	Ernest J. Essad Jr. Mark R. James WILLIAMS, WILLIAMS, RATTNER & PLUNKETT, P.C. 280 North Old Woodward Avenue, Suite 300 Birmingham, MI 48009 Telephone: (248) 642-0333 Facsimile: (248) 642-0856 Email: EJEssad@wwrplaw.com Email: mrjames@wwrplaw.com -and- Alfredo R. Pérez WEIL, GOTSHAL & MANGES LLP 700 Louisiana Street, Suite 1600 Houston, TX 77002 Telephone: (713) 546-5000 Facsimile: (713) 224-9511 Email: alfredo.perez@weil.com
<i>Wayne County, Michigan</i>	BUTZEL LONG, a professional Corporation Max J. Newman (P51483) Beth Gotthelf (P38951) Attorneys for Wayne County Stoneridge West 41000 Woodward Ave Bloomfield Hills, MI 48304 (248) 258-2907 newman@butzel.com

Party	Counsel for Party
<i>Oakland County, Michigan</i>	<p>Joseph M. Fischer (P13452) Robert A. Weisberg (P26698) Christopher Grosman (P58693) CARSON FISCHER, P.L.C. 4111 Andover Road, West- Second Floor Bloomfield, Michigan 48302-1924 Telephone: (248) 644-4840 Facsimile: (248) 644-1832 JFischer@CarsonFischer.com RWweisberg@CarsonFischer.com CGrosman@CarsonFischer.com</p> <p>-and-</p> <p>Sara K. MacWilliams (P67805) Jaye Quadrozzi (P71646) YOUNG & ASSOCIATES 27725 Stansbury Blvd., Suite 125 Farmington Hills, MI 48334 Telephone: (248) 353-8620 Email: efiling@youngpc.com macwilliams@youngpc.com quadrozzi@youngpc.com</p>

Party	Counsel for Party
<p><i>U.S. Bank National Association, as Trustee for the Water and Sewer Bonds</i></p>	<p>David E. Lemke (TN13586) Paul S. Davidson (TN11789) Heather J. Hubbard (TN23699) WALLER LANSDEN DORTCH & DAVIS, LLP 511 Union Street, Suite 2700 Nashville, Tennessee 37219 Phone: (615) 244-6380 Fax: (615) 244-6804 -and- Robert J. Diehl, Jr. (MI31264) Jaimee L. Witten (P70068) BODMAN PLC 1901 St. Antoine Street, 6th Floor Detroit, Michigan 48226 Phone: (313) 393-7597 Fax: (313) 393-7579</p>

Party	Counsel for Party
<p><i>Detroit Fire Fighters Association, IAFF Local 344 and the Detroit Police Officers Association</i></p>	<p>Barbara A. Patek (P34666) Earle I. Erman (P24296) ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C. 400 Galleria Officentre, Suite 444 Southfield, MI 48034 Telephone: (248) 827-4100 Facsimile: (248) 827-4106 E-mail: bpatek@ermanteicher.com</p> <p>-and-</p> <p>James M. Moore (P17929) GREGORY, MOORE, JEAKLE & BROOKS, PC 65 Cadillac Square, Suite 3727 Detroit, MI 48226-2893 Telephone: (313) 964-5600 Facsimile: (313) 964-2125 E-mail: jim@unionlaw.net</p> <p><i>Counsel for the DPOA</i></p> <p>-and-</p> <p>Christopher P. Legghio (P27378) Alidz Oshagan (P77231) LEGGHIO & ISRAEL, PC 306 S. Washington, Suite 600 Royal Oak, MI 48067 Telephone: 248 398 5900 x 1131 Facsimile: 248 398 2662 E-mail: CPL@legghioisrael.com</p> <p><i>Counsel for the DFFA</i></p>

Schedule A

I. DEFINITIONS

1. The term “Gabriel Roeder” shall mean Gabriel Roeder Smith & Company.
2. The term “City” shall mean the City of Detroit, Michigan, as well as any of its past or present divisions, such as, but without limitation, the Detroit Arts Commission, and departments, officials, trustees, agents, affiliates, employees, attorneys, advisors, professionals, representatives, advisors, representatives, and all other persons acting or purporting to act on their behalf, including Kevyn D. Orr acting as Emergency Manager and any successors.
3. The term “Milliman” shall mean the Milliman actuarial consulting firm.
4. The term “Plan of Adjustment” shall mean the City’s Amended Plan for the Adjustment of Debts of the City of Detroit, filed on March 31, 2014 [Doc. No. 3380].
5. The term “Retirement Systems” shall mean the DGRS and the DPFRS.
6. The term “DGRS” shall mean the Detroit General Retirement System.

7. The term “DPFRS” shall mean the Detroit Police and Fire Retirement System.

II. INSTRUCTIONS

1. Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, you are directed to designate one or more of your officers, directors, managing agents, or other persons who consent to testify on your behalf and who have knowledge of and are adequately prepared to testify concerning the topics enumerated below.

2. The use of the singular form includes the plural and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses.

3. All terms and phrases used herein shall be construed in an ordinary, common-sense manner, and not in a technical, strained, overly-literal, or otherwise restrictive manner.

III. Deposition Topics

1. Actuarial valuations performed by Gabriel Roeder of the DGRS and DPFRS.

2. The valuation of assets and liabilities for the DGRS and DPFRS, and the allocation of such assets and liabilities by division of the City..

3. Analysis performed by Gabriel Roeder relating to projections of investment rates of return of the DGRS and DPFRS.
4. Analyses and reviews performed by Milliman with respect to the DGRS and DPFRS, any review by Gabriel Roeder of such analyses or reviews, and any communications concerning such analyses or reviews.
5. Assumptions underlying Gabriel Roeder's actuarial valuations, including information provided to Gabriel Roeder by the DGRS, DPFRS, or the City.
6. Information provided to Gabriel Roeder regarding the DGRS and DPFRS investment policies.
7. Any work done by Gabriel Roeder relating to health care benefits provided to retiree participants of DGRS and DPFRS.
8. Any analysis performed by Gabriel Roeder relating to the City's Plan of Adjustment.

Certificate of Service

I, Stephen C. Hackney, hereby certify that on July 7, 2014, I caused the foregoing *Notice of 30(b)(6) Deposition of Gabriel Roeder Smith and Company* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

/s/ Stephen C. Hackney

Stephen C. Hackney